

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FIDELITY AND GUARANTY LIFE
INSURANCE CO.

Plaintiff

V.

CNA FINANCIAL CORPORATION

and

CONTINENTAL ASSURANCE CO.

and

VALLEY FORGE LIFE INSURANCE CO.

and

KENNETH D. KEATING

Defendants.

Civil Action No.
AMD-020CV-2317

**PLAINTIFF’S MOTION TO COMPEL RESPONSES TO PLAINTIFF’S SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff, Fidelity and Guaranty Life Insurance Co., by undersigned counsel, moves, pursuant to Rule 37(a) of the Federal Rules of Civil Procedure, to compel responses to Plaintiff's Second Request for Production of Documents.

In support of its Motion, Plaintiff hereby incorporates by reference its Memorandum in Support of Motion to Compel Responses of CNA to Plaintiff's Second Request For Production of Documents. Respondent CNA should be compelled to respond to those Requests outlined in the Memorandum in Support because, in accordance with Rule 26(b)(1) of the Federal Rules of

Civil Procedure, the documents sought (1) are not privileged and (2) are relevant to Plaintiff's claim.

Dated: June 27, 2003

Respectfully submitted,

SHAWE & ROSENTHAL, LLP

/s/

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